

RECORDS OF PROCESSING ACTIVITY (ROPA) GUIDELINES



Records of Processing Activity (ROPA)

Definitions:

1. Botswana Data Protection Act (2024)
2. Data Controller: Refer to Botswana Data Protection Act (2024)
3. Data Processor: Refer to Botswana Data Protection Act (2024)

Note: Use this document in conjunction with the ROPA Template in Excel

1. Each data controller and, where applicable, the controller's representative, shall maintain a record of processing activities under its responsibility.
2. The record in subsection (1) shall contain the following information —
 1. the name and contact details of the data controller and, where applicable, the joint data controllers, the controllers representative and the data protection officer;
 2. the purpose of processing;
 3. a description of the categories of data subjects and of the categories of personal data
 4. the categories of recipients to whom the personal data is or will be disclosed including recipients in third countries or international organisations;
 5. where applicable, transfers of personal data to a third country or an international organisation, including the identification of that third country or international organisation and, in the case of transfer under section 76 of the Botswana Data Protection Act (2024), the documentation of suitable safeguards;
 6. where possible, the envisaged time limits for erasure of the different categories of data;
 7. where possible, a general description of the technical and organisational measures under section 62 of the Botswana Data Protection Act (2024).
3. A data processor and, where applicable, the processor's representative shall maintain a record of all categories of processing activities carried out on behalf of a data controller, containing —
 1. the name and contact details of the data processor or data processors and of each data controller on behalf of which the data processor is acting, and where applicable the controller or processor's representative the data protection officer;
 2. the categories of processing carried out on behalf of each data controller;
 3. where applicable, information under section 62(2);
 4. where possible, a general description of the technical and organisational measures under section 62.
4. The records in accordance with section 62(1) and 62(3) shall be in writing, including in electronic form:
 1. Provided that the obligations in section 62(1) and 62(3) shall not apply to an enterprise or organisation employing less than 250 persons unless the processing it carries out —
 1. is likely to result in a risk to the rights and freedoms of data subjects,
 2. is not occasional, or
 3. includes sensitive personal data in terms of section 30 (1) or personal data relating to criminal convictions or offences under section 32.
5. The data controller or data processor and, where applicable, the controller or processor's representative shall make the record available to the Commission on request.
6. The data controller and data processor and where applicable their representatives shall cooperate, on request, with the Commission in the performance of its duties.